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8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
 11 Plaintiff,  
 12 v.  
 13 RICHARD EDWIN SANCHEZ,  
 AKA "TRIGGER"  
 14 Defendant.

**CRIMINAL INDICTMENT**

Case No. 2:23-cr-0158-GMN-DTA

**VIOLATIONS:**

21 U.S.C. §§ 841(a)(1) and (b)(1)(B) –  
 Distribution of a Controlled Substance  
 18 U.S.C. §§ 922(a)(1)(A), 923(a), and  
 924(a)(1)(D) – Engaging in the Business of  
 Dealing and Manufacturing Firearms Without a  
 License  
 18 U.S.C. § 922(o) – Possession or Transfer  
 of a Machinegun

20 **THE GRAND JURY CHARGES THAT:**

21 **COUNT ONE**

22 *Distribution of a Controlled Substance*  
 (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

1 On or about April 21, 2023, in the State and Federal District of Nevada,

2                   **RICHARD EDWIN SANCHEZ,**  
3                   **aka "Trigger,"**

4 defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II  
5 controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and  
6 841(b)(1)(C).

7                   **COUNT TWO**

8                   *Engaging in the Business of Dealing or Manufacturing Firearms Without a License*  
9                   (18 U.S.C. §§ 922(a)(1)(A), 923(a) and 924(a)(1)(D))

10                  Between on or about April 24, 2023, and August 3, 2023, in the State and Federal  
11 District of Nevada,

12                  **RICHARD EDWIN SANCHEZ,**  
13                  **aka "Trigger,"**

14 defendant herein, not being a licensed dealer, importer, or manufacturer of firearms within  
15 the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the  
16 business of dealing firearms, in violation of Title 18, United States Code, Sections  
17 922(a)(1)(A), 923(a), and 924(a)(1)(D).

18                  **COUNT THREE**

19                  *Distribution of a Controlled Substance*  
20                  (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

21                  On or about April 24, 2023, in the State and Federal District of Nevada,

22                  **RICHARD EDWIN SANCHEZ,**  
23                  **aka "Trigger,"**

24 defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II  
25 controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and  
26 841(b)(1)(C).

**COUNT FOUR**

*Distribution of a Controlled Substance*  
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about April 26, 2023, in the State and Federal District of Nevada,

**RICHARD EDWIN SANCHEZ,  
aka "Trigger,"**

defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FIVE**

*Distribution of a Controlled Substance*  
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about May 1, 2023, in the State and Federal District of Nevada,

## RICHARD EDWIN SANCHEZ, aka "Trigger,"

defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

## COUNT SIX

*Distribution of a Controlled Substance*  
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about May 5, 2023, in the State and Federal District of Nevada,

## RICHARD EDWIN SANCHEZ, aka "Trigger,"

defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

## **COUNT SEVEN**

*Distribution of a Controlled Substance*  
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about May 18, 2023, in the State and Federal District of Nevada,

**RICHARD EDWIN SANCHEZ,  
aka "Trigger,"**

defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

## **COUNT EIGHT**

*Possession or Transfer of a Machinegun*  
(18 U.S.C. §§ 922(o) and 924(a)(2))

On or about May 18, 2023, in the State and Federal District of Nevada,

## RICHARD EDWIN SANCHEZ, aka "Trigger,"

defendant herein, did knowingly possess or transfer a machinegun, to wit: four selector switches used to modify semi-automatic firearms to fire as fully automatic firearms, enabling the firearm to automatically shoot more than one shot without manual reloading, by a single function of the trigger, all in violation of Title 18, United States Code, Section 922(o) and 924(a)(2).

## **COUNT NINE**

*Distribution of a Controlled Substance*  
(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

On or about May 23, 2023, in the State and Federal District of Nevada,

**RICHARD EDWIN SANCHEZ,  
aka "Trigger,"**

1 defendant herein, did knowingly and intentionally distribute cocaine, a Schedule II  
2 controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and  
3 841(b)(1)(C).

4 **COUNT TEN**

5 *Possession or Transfer of a Machinegun*  
6 (18 U.S.C. §§ 922(o) and 924(a)(2))

7 On or about June 6, 2023, in the State and Federal District of Nevada,

8 **RICHARD EDWIN SANCHEZ,**  
9 **aka "Trigger,"**

10 defendant herein, did knowingly possess or transfer a machinegun, to wit: seven selector  
11 switches used to modify semi-automatic firearms to fire as fully automatic firearms,  
12 enabling the firearm to automatically shoot more than one shot without manual reloading,  
13 by a single function of the trigger, all in violation of Title 18, United States Code, Section  
14 922(o) and 924(a)(2).

15 **COUNT ELEVEN**

16 *Possession or Transfer of a Machinegun*  
17 (18 U.S.C. §§ 922(o) and 924(a)(2))

18 On or about June 13, 2023, in the State and Federal District of Nevada,

19 **RICHARD EDWIN SANCHEZ,**  
20 **aka "Trigger,"**

21 defendant herein, did knowingly possess or transfer a machinegun, to wit: seven selector  
22 switches used to modify semi-automatic firearms to fire as fully automatic firearms,  
23 enabling the firearm to automatically shoot more than one shot without manual reloading,  
24 by a single function of the trigger, all in violation of Title 18, United States Code, Section  
25 922(o) and 924(a)(2).

## COUNT TWELVE

*Possession or Transfer of a Machinegun*  
(18 U.S.C. §§ 922(o) and 924(a)(2))

On or about August 3, 2023, in the State and Federal District of Nevada,

## RICHARD EDWIN SANCHEZ, aka "Trigger,"

defendant herein, did knowingly possess or transfer a machinegun, to wit: three selector switches used to modify semi-automatic firearms to fire as fully automatic firearms, enabling the firearm to automatically shoot more than one shot without manual reloading, by a single function of the trigger, all in violation of Title 18, United States Code, Section 922(o) and 924(a)(2).

**DATED:** this 23<sup>rd</sup> day of August 2023.

A TRUE BILL;

/S/

## FOREPERSON OF THE GRAND JURY

JASON M. FRIERSON  
United States Attorney

DAVID KIEBLER  
Assistant United States Attorney